

**APPENDIX B**  
**COMMENTS and RESPONSES**

## Public Comment and Response:

### OVERVIEW:

During the 30-day comment period (November 8 – December 8, 2006) the City received comments in letters and e-mails from individuals and public agencies regarding information presented in the November 8, 2006 Draft Environmental Impact Statement (DEIS) for the City of Liberty Lake Urban Growth Area Boundary Alternatives.

Each response is labeled with the letter "L" for indicating a letter, "F" indicating a fax, or "E" indicating an e-mail. The City response is presented in bold after each comment.

### COMMENTS FROM INDIVIDUALS:

E Tom Agnew  
E Bruce Andre  
E Sheila Bell  
L Abby Byrne  
E Sharon Carlson  
L Heather Chalich  
E Beth Cochiarella  
L Myles and Linda Dewey  
L Keith W. Harris  
L Leanne Harris  
L Maxine Harris  
E Melody Huber  
E Charles and Barbara Kogler  
L Donald and Eleanor Limmer  
E Bob Martin  
L Kerry Masters  
L Thomas McLaughlin  
L Mary L. Munger  
L Kottayam V. Natarajan Jr. and Alison Ashlock  
E Dave Paperd  
L Elizabeth Pedersen  
E Dan Polson  
L Bill Quirk  
L Gary Reser  
E Teresa Seely  
E Jo Lynne Seuffer  
E Liz and Lee Shepard  
E Paul Shields (Group e-mail)  
Keith and Brenda Shields  
Ed and Margaret Shields  
Heather Amity  
Rich Cook  
Barb Oviatt  
Roger Walth  
Pam Orebaugh  
L Bill Quirk  
L Kathi Shirley (1)  
L Kathi Shirley (2)  
L Steve Shirley  
L Steve Shirley (C.A.U.S.E. Petition)  
E Richard and Lois Steury  
L Karen Toreson  
L Patty Weiser (received after DEIS comment deadline)  
L David and Jan Wesche  
L Lorna Willard

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COMMENTS FROM AGENCIES:

- E Dee Caputo, AICP, Senior Planner, Growth Mgmt. Services, WA Dept. of Community, Trade, and Economic Development
- E Karin Divens, Area Habitat Biologist, WA Department of Fish and Wildlife
- F Scott Engelhard, Transportation Engineering Coordinator, Division of Engineering and Roads, Spokane County
- E Greg Figg, Transportation Planner, Planning, WA Dept. of Transportation
- L Dave Jackman, Director, Auxiliary Services, Central Valley School District #356
- F Neil Kersten, AIA, Public Works Director, City of Spokane Valley
- L Stephanie Kramer, Assistant State Archaeologist, Department of Archaeology & Historic Preservation
- L David Lobdell, Assistant Fire Chief, Spokane County Fire District 1
- E Quanah Matheson, Cultural Resources Mgr./THPO, Coeur d'Alene Tribe
- F Terri Miller, SEPA Coordinator, WA Department of Ecology, Eastern Regional Office
- E John Pederson, Asst. Director, Spokane County Department of Building and Planning
- F N. Bruce Rawls, P.E., Utilities Director, Spokane County Utilities Division
- L Chuck Studer, Air Quality Engineer I, SCAPCA

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**Amanda Tainio**

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**From:** Doug Smith [dsmith@libertylakewa.gov]  
**Sent:** Friday, December 08, 2006 8:37 AM  
**To:** Mary Wren  
**Cc:** Amanda Tainio  
**Subject:** FW: DEIS Comment

-----Original Message-----

**From:** Tom Agnew [mailto:Tom@AgnewConsulting.com]  
**Sent:** Friday, December 08, 2006 8:28 AM  
**To:** Doug Smith  
**Cc:** Steve & Kathy Shirley; Steph Agnew; Lee Mellish; Harley Halverson  
**Subject:** DEIS Comment

Hello Doug,

Attached is my comment for the DEIS.

Thank you.

Tom Agnew  
AGNEW CONSULTING  
1220 S. Starr  
Liberty Lake, WA 99019  
509-255-6686 (voice/fax)  
509-953-1292 (cell)  
Tom@AgnewConsulting.com

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12/8/2006

December 8, 2006

City Mayor, City Council, Planning Commission, Planning Department, Citizens.

Re: City of Liberty Lake November 8, 2006 DEIS Urban Growth Area Boundary Alternatives

Please accept this in support of Alternative I, and in opposition to providing additional area within the UGB, regarding the City's DEIS

**Too many acres.** More than 50% of the City's existing UGA remains undeveloped according to the City's Comp Plan dated 9/16/03. This undeveloped land, already on the books to triple City population, could easily be configured to accommodate additional population, and it already exists within the City of Liberty Lake. Maybe in 5 or 10 years, as this area develops, we would have a better idea of whether more area is needed. Most in this community can't fathom designating more of the beautiful landscape for urban density development at this time.

**Too many people.** The City has chosen an extremely aggressive population allocation despite its recent, explosive, unsustainable growth. This community has experienced more than our fair share of urban growth in the past few years. The existing City plan calls for tripling population, and now the city wants more!! Let's grow more gracefully. The City would be wise and justified to reduce its share of additional population. There is ample urban space elsewhere within the County for the additional population the City has chosen to pursue. Why cram this population into one of the smallest, newest, most stressed infrastructure areas in the County, especially when there exist other UGA's with space for more population?

**Too many questions.** The original comment I submitted contains many questions which the DEIS fails to answer, most of which are now being asked by others. The State DOT asks the City regarding studies or plans to update the I-90/Harvard overpass. The CVSD asks the City to consider critically overcrowded schools. The County asks the City to consider wetlands and reclaimed water reuse areas. These questions demand community wide, well-reasoned resolution based on best available science, most of which do not exist as documented in the DEIS.

Only alternative I offers assurance that urban growth occurs within urban areas at urban densities. All other alternatives, with proposed densities as sprawling as 1 residence per Acre...less than 3 people per Acre, are, in fact, urban sprawl. Growth management is in large part intended to keep urban sprawl from consuming rural areas.

Thank you very much for you time and consideration.

Sincerely,

Tom Agnew  
1220 S. Starr  
Liberty Lake, WA 99019  
509-255-5229

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**Response to Tom Agnew:**

- 1) Not a comment on the adequacy of the DEIS, but rather an expression of concern for various issues and a preference for a particular planning outcome.**
- 2) The DEIS that was prepared by the City of Liberty Lake for the UGA boundary alternatives meets all requirements for state law and sufficiently addresses items for this non-project action.**

**A summary of "Questions and Answers Generated Through the Public Process" is attached to this addendum, and was posted on the City of Liberty Lake website and e-mailed out December 6, 2006.**

## Doug Smith

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**From:** Doug Smith [dsmith@libertylakewa.gov]  
**Sent:** Friday, December 08, 2006 7:06 PM  
**To:** bruce@bruceandre.com  
**Cc:** jfrank@greenstonehomes.com; keva@monson.com; antlerpaul@aol.com; Tom@AgnewConsulting.com; divenkad@dfw.wa.gov  
**Subject:** RE: DEIS comments

Hello Bruce,

Thank you for your comments, however you have offered nothing substantive on the DEIS. Rather you have decided to make a weak attempt at attacking my character (a predictable course for those with nothing of merit to offer).

Let me say to you and for the record, you might be the type of person that would buy land and try to sway a decision for your personal benefit, but that is not how I operate. I bought the property because it was zoned appropriately for a winery. If you had bothered to investigate beyond what you wanted to find, you would have discovered the land is zoned rural conservation and is partially within a flood plain. This makes development of this land a poor candidate for urban development.

My question to you is why are you attempting to prevent the UGA from expanding? We all know a growing number of people want to live here, and for those already living here to denying that is both selfish and self-serving. Why should others be denied what you have? Is it your desire to restrict the supply of land so the property you and other members of the "CAUSE" bought ten years ago (in critical areas by the way) and is now valued at 5 times what you paid for it will continue to see double digit appreciate? I hope not, I prefer to think you and other just want to keep the beauty all to yourselves. After all you are the only ones to deserve it as true "Liberty Lakers". What is the residency requirement to be in that club? Is it 10 years, 20, or is proximity to the shoreline?

I apologize for my sarcasm, but it gets tiresome listening to the rhetoric and hypocrisy. I have spent the last 5 years of my life diligently working to ensure the quality of life in this community is maintained. Given all the opportunity and natural beauty this area has to offer, I will be the first to admit it has been a challenge. I don't expect to receive any type of appreciation from you, but I don't expect false accusations either. The day my property is in a UGA and I make application to develop it stand up and cry foul, but until then keep your petty paranoia to yourself. I challenge you and the group you represent to redirect the energy being used to fight change and to focus it toward productive solutions.

Please accept this as a receipt of your comments,

Doug

-----Original Message-----

**From:** bruce [mailto:bruce@bruceandre.com]  
**Sent:** Friday, December 08, 2006 4:31 PM  
**To:** dsmith@libertylakewa.gov  
**Cc:** jfrank@greenstonehomes.com; keva@monson.com; antlerpaul@aol.com; Tom@AgnewConsulting.com; divenkad@dfw.wa.gov  
**Subject:** DEIS comments

<< File: Doug Smith.doc >>

Doug,  
My comments follow. Also attached as a word doc. Please acknowledge receipt.  
Bruce Andre

Doug Smith  
Director Liberty Lake Planning and Community Development

27719 E. Country Vista Drive  
Liberty Lake, Wa 99019  
December 7, 2006

Re: City of Liberty Lake Draft Environmental Impact Statement UGA Boundary changes

Mr. Smith,

Please do not move the Southern UGA boundary. This area is primarily rural and designated for conservation. The infrastructure necessary for urban development i.e. improved roads, water, sewer, schools, and fire protection are totally lacking and unfunded.

This change would alter the nature of the Liberty Lake community

Conflict of Interest

I am greatly concerned that you, Doug Smith, have much to gain from the proposed changes. According to Spokane County records, you acquired parcel 55282.0122, a 10.8 acre parcel described as "Residential land Undivided" on 4/6/2005 for \$82,500.00.

It is just West of Henry Road and adjacent to an existing PUD (file # PE-1887-01/PUDE-5-01). This PUD, also known as Saltese Hilltop Acres, will consist of at least 107 lots and is a significant portion of the area within the proposed UGA move. The PUD was acquired by BlackRock shortly before your purchase in November of 2004.

If your parcel were divided according to the City densities of at least 4 units/ acre, that would yield approximately 40 lots. At \$40,000/lot, forty lots represents a gross of 1.6 million dollars. That is a lot of reasons to be biased in this matter.

Bruce Andre

Sent via the ASISNA Mail Services. mail.bruceandre.com

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**Doug Smith**

**From:** Doug Smith [dsmith@libertylakewa.gov]  
**Sent:** Monday, December 11, 2006 7:36 AM  
**To:** bruce@bruceandre.com  
**Cc:** rbcocchiarella@msn.com; gr8dessert@mail.asisna.com; keva@monson.com; monique@diamondzsalon.com; sunshiners@ccser.com; spiritdoc@ccser.com; Tom@AgnewConsulting.com; antlerpaul@aol.com; dppaperd@aol.com; KLiberty@aol.com  
**Subject:** RE: Lakers

Good morning Bruce,

I agree, Liberty Lake represents a sense of place for many, but it is temporal and will continue to evolve. The best way to secure any vestige of what you are fighting to preserve is planning. The areas within the southern UGA study area will develop, just as the shorelines you live on. The delta we have to work with is how will it develop, how will it look, and in what time frame. I would also add, a sense of place is as much about the people as it is the environment they live in. When there is a shared vision, we will have a sense of community. Lets try working on that...

Have a great day,  
Doug

-----Original Message-----

**From:** bruce [mailto:bruce@bruceandre.com]  
**Sent:** Sunday, December 10, 2006 8:42 AM  
**To:** dsmith@libertylakewa.gov  
**Cc:** rbcocchiarella@msn.com; gr8dessert@mail.asisna.com; keva@monson.com; monique@diamondzsalon.com; sunshiners@ccser.com; spiritdoc@ccser.com; Tom@AgnewConsulting.com; antlerpaul@aol.com; dppaperd@aol.com; KLiberty@aol.com  
**Subject:** Lakers

December 9, 2006

Doug Smith,

Your letter yesterday deserved a response.

It is all about a sense of place. Liberty Lake is different. It is, (I almost hate to use this word) special.

My opinion comes from experience. I was born and raised in Ohio, and over the years spent significant time in Connecticut, Maine, Florida, Pennsylvania, and almost 20 years in Chicago. My photographic jobs have taken me numerous other places. I sure haven't seen it all, but I've been lucky enough to have had a good sampling.

Communities often spring up because of one reason. Their existence is owed to a specific employer, a military base, school, others religion, or proximity to recreation. Liberty Lake is almost unique in that it is blend of all of those located in one of the most beautiful Alpine valleys in America. When I moved here in 1993, I felt unbelievably lucky to live here. I knew most of my

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neighbors, knew their dogs' names, there was near-wilderness at the end of my driveway, and my commute was 15 minutes. There was an incredible sense of community.

It is this sense of special place, this uniqueness that arouses the defensive passions of the Liberty Lakers. You were correct about the residency requirements to be in that club. The long-timers remember when Liberty Lake was even more pristine. Proximity to the shoreline is accurate only in that when one is further away, the community of Liberty Lake loses that uniqueness. Freeway ramps, Albertsons, Home Depots, and strip malls are pretty much the same everywhere.

The threat is uncontrolled growth. The kind of growth Liberty Lake has been experiencing for the last two or three years. Growth at ten percent is a serious threat. To paraphrase EWU's Grant Forsyth's words, "you don't manage it, it manages you." The community has spoken. Often. They don't want traffic roundabouts. They don't want their children to ride an hour to school. They don't want to wait in traffic 20 minutes to get on I-90. These things are the friction, the wear and tear of modern living.

The City of Liberty Lake was incorporated to get a handle on all of this. It is unfortunate that zoning required a split in the community.

The City has done many things right.

We have an outstanding Police force. In these times of meth-heads carrying loaded shotguns, that is very much a comfort.

I understand that you requested and got fewer homes in the Legacy Ridge development.

The acquisition of the Trailhead golf course was visionary. The view is tremendous. It could have been hundreds of houses.

More such vision is necessary.

Right now the City could offer to trade development rights to Legacy Ridge in exchange for not developing the lots immediately adjacent to Liberty Lake Road. It would preserve a Green Space corridor to the South. Similar arrangements might be made with the Rudeen/Main project so that it doesn't replicate the disaster that is Northwood.

The City has the power to allocate population growth. You set the numbers and issue building permits. You can put your foot on the brake. Declare a moratorium on residential building. Just because space exists, it doesn't need to be filled.

Moving the Southern UGA should not be an option. Chesrown knew that the property was zoned rural conservation when it was acquired. The lure of money and tax base should be resisted. Sixteen hundred homes in that development would forever alter our community. We would be no different than some overbuilt Seattle suburb saddled with significant public debt to improve roads and schools. This is not just a Laker sentiment. Last week a petition requesting no movement of the UGA was shown to 71 people in the City. 67 signed.

As a taxing entity, the City of Liberty Lake has the power to raise funds and remove critical properties from development thru outright acquisition or conservation easements. The owners deserve fair compensation. A committee could investigate options: bonds, retail tax, flat tax, and/or a percentage of real estate sales (most progressive). CAUSE members would be more than willing to circulate petitions or help in this process. Let the voters of 99019 decide the shape of their community.

Regarding your parcel. My experience with public officials in Chicago required calling that out. The issue would disappear if you would be willing to issue a conservation easement. There are significant tax advantages, especially if the land is involved in farming.

Let us work together and preserve what we have.

Bruce Andre

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Sent via the ASISNA Mail Services. [mail.bruceandre.com](mailto:mail.bruceandre.com)

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**Response to Bruce Andre:**

- 1) Not a comment on the adequacy of the DEIS, but rather an expression of a preference for a particular planning outcome.
- 2) There is no clear conflict of interest brought about by the fact that the SEPA responsible official owns land in some of the proposed alternatives. If land ownership is the sole factor in constituting a conflict of interest, then every comment received from a landowner in any of the UGA alternatives would have to be dismissed for the same reason. The comment writer presumes to know what Mr. Smith's plans for his property are. In addition, Mr. Smith's land is zoned rural conservation, and as with all lands zoned rural conservation, has never been eligible for inclusion in the UGA.

**Response to Sheila Bell:**

**Not a comment on the adequacy of the DEIS, but rather an expression of concern for various issues and a preference for a particular planning outcome.**

Amanda Tainio

From: Sheila Bell [gamehen@ccser.com]  
 Sent: Wednesday, December 06, 2006 11:09 AM  
 To: Amanda Tainio  
 Subject: Re: City Council Public Hearing

I received the Dec. 19th Planing Hearing City Council Notice. Thank you. Our daughter is expecting her first child (our first grandchild) around that time. When she calls from Seattle, we are off. It shouldn't be as early as Dec. 13th, but you never know. Please pass along to Doug that if I am not there on the 13th, that is why. My votes are choices 1 or 3 of the seven alternatives. I want that to be noted in the minutes and to my fellow Commissioners. Thanks, Sheila. I'll return the DEIS book I borrowed on Monday. Merry Christmas and thanks for all you do.

----- Original Message -----

From: Amanda Tainio  
 To: [atainio@libertylakewa.gov](mailto:atainio@libertylakewa.gov)  
 Sent: Wednesday, December 06, 2006 10:11 AM  
 Subject: City Council Public Hearing

**LEGAL NOTICE OF CITY COMPREHENSIVE PLAN AND CITY DEVELOPMENT CODE  
 AMENDMENTS PUBLIC HEARING**

**PUBLIC NOTICE OF CITY COMPREHENSIVE PLAN AND CITY DEVELOPMENT CODE  
 AMENDMENTS PUBLIC HEARING**

**NOTICE IS HEREBY GIVEN TO ALL INTERESTED PERSONS THAT:** The City Council of the City of Liberty Lake will hold a public hearing on the proposed City Comprehensive Plan and Development Code Amendments. The public will have the opportunity to comment on the above-mentioned proposals. The public hearing will be held during the regular City Council Meeting on Tuesday, December 19, 2006, beginning at 7pm @ the Liberty Lake City Hall Council Chambers, 22710 E. Country Vista Blvd., Liberty Lake, WA.

A brief presentation on the proposals will be conducted at the beginning of the hearing.

If you have any questions, please contact the City of Liberty Lake Planning & Community Development Department at 755-6706.

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12/6/2006



TO: SEPA Responsible Official, City of Liberty Lake  
Doug Smith, Director  
Liberty Lake Planning and Community Development Department  
27710 E. Country Vista Drive  
City of Liberty Lake, WA 99019

Received By  
City of Liberty Lake

NOV 27 2006

City Clerk/Treasurer  
Initials *js*

FROM: Abby Byrne  
305 S. Liberty Lake Road, #7  
Liberty Lake, WA 99019

DATE: November 27, 2006

RE: Written testimony: The City of Liberty Lake Draft Environmental Impact  
Statement Urban Growth Boundaries (DEIS)

The eventual location of the City of Liberty Lake's Urban Growth Boundary will have a very substantial impact on City residents as well as the entire region. I believe it is essential, in the interest of effective land use planning, that the The City of Liberty Lake Draft Environmental Impact Statement Urban Growth Boundaries (DEIS) provide useful information for elected and appointed officials in both the City of Liberty Lake and Spokane County as decisions are made concerning final Urban Growth Boundaries for Spokane County.

The following comments on the DEIS are intended to be positive contributions to this decision making process. My testimony is based on laws and guidelines from the Revised Code of Washington (RCW) Chapters 43.21C and 36.70A, the Washington State Administrative Code (WAC) Chapters 197-11 and 365-195, State Environmental Policy Act SEPA Handbook published by the Washington State Department of Ecology and my over 26 years experience as a practicing professional planner.

I have organized the comments as follows: I- Alternatives and II-Document Contents. It is important to state that my comments are made as a citizen not as a planning consultant and are

**ABBY BYRNE**

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305 S. Liberty Lake Rd. #7  
Liberty Lake, WA 99019  
509-255-9418

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representative of issues and problems I found in a general review of the document. I use examples to support comments rather than specifying every situation in the DEIS that fits the problem area.

## **SECTION I - ALTERNATIVE CHOICES**

The DEIS supports only Alternative #1 and #3 Adjusted UGA - NW as viable choices for Urban Growth Areas for the City of Liberty Lake because they:

1. Fit the criteria established for location of an urban growth area in RCW 36.70A.110(3) and
2. are currently characterized by urban growth.

In page after page, this DEIS clearly documents Alternatives #2, 4, 5, 6 and 7 are not characterized by urban growth or appropriate for urban development at this time as defined in state laws and Spokane Countywide Planning Policies.

Currently Alternatives #2, 4, 5, 6 and 7 are characterized by rural densities, critical areas including wetlands and steep slopes and no infrastructure in place to support urban growth such as roads capable of supporting urban densities, sidewalks, sanitary sewer and potable water facilities. A principle feature of growth management planning in Washington State is concurrency, the assurance that facilities and services are available when the impacts of development occur or within specific a timeframe thereafter [WAC 365-195.040(3)]. The City of Liberty Lake does not have the capability, without depending on other units of local government, to fulfill the concurrency requirement.

It also should be noted the Board of Spokane County Commissioners Resolution 60714, Spokane County Screening and Evaluation Criteria for the GMA Comprehensive Plan Update, 8/15/06, offers local government a clear set of evaluation criteria for potential expansion of urban growth areas. Included in this criteria, for example are, areas with existing urban development patterns should be given priority, rural conservation areas should not be included in urban growth areas, and areas with significant storm water problems are not preferred. Alternatives # 2, 4, 5, 6 and 7 do not meet any of these criteria.

## II. DOCUMENT CONTENTS

### A. POPULATION ALLOCATION

#### 1. Complete information

The discussion about population allocation throughout the documents omits important information. No where in the DEIS is there a clear explanation of the fact that the 20 year population projection adopted by the City of Liberty Lake is not a final number of people the City is required to plan for in the 20 year time horizon in the DEIS. For example, Chapter 3.4.1.2.1 states "Liberty Lake's portion of the population allocation is an additional 15, 586 people" (Page 3-36) but never clarifies this is an initial allocation only. At this point in the planning process the DEIS is intended to provide information which in part is to address if this initial population allocation, chosen by the City, is feasible.

The intent of RCW Chapter 43.21C is to ensure environmental values are considered in the decision making process, in this case, prior to the decision by the Spokane County Board of Commissioners on the final urban growth boundaries for the City of Liberty Lake. The population estimate of 15, 586 in the DEIS was adopted by the Board of County Commissioners on May 23, 2006 for initial planning purposes only. If this allocation can't reasonably be accomplished, which I believe the analysis in DEIS demonstrates, there is the option for the City to ask for a reduction in this initial allocation.

#### 2. Consistency of terminology

Population projections should be used consistently throughout the DEIS. The constantly changing use of the words projected, forecasted and expected in statements about population throughout the DEIS is confusing. It appears population projections is the most accurate term based on the References in Appendix C. Population projections are simple statistical techniques based on assumptions about future birth, death and migration rates to estimate how many people will live in a community at a certain point in the future. Population forecasts are very complex using sophisticated analytical techniques, most often, made by qualified demographers. Finally, the word expected implies certainty whereas any estimate of the future is really a best guess.



## **B. ENVIRONMENTAL IMPACTS**

### **1. Clarity of the descriptions**

A non-project DEIS must provide adequate information to assist in understanding the “big picture” (SEPA Handbook, 4 . Nonproject Review). It is understood that the level of detail can be general, but the DEIS should furnish enough information to fairly assess the potential for both cumulative and regional negative impacts.

Examples:

#### **a. Earth**

The Summary of the Environment has the following the statement Page 2, “Each alternative is expected to have an impact on elements of the earth ...”. In Chapter 2.1.2 the word may is used in the discussion of impacts on elements of the earth. This must be changed to not only to stay consistent with the Summary, but because it is impossible for any intensity of urban development with buildings and impervious surfaces not to alter the topography to some degree. For example, a review of the natural environment characteristics in this document show steep slopes, rock outcrops and erosion potential which alteration or disruption will impact. This is especially true as the cumulative impacts of construction activity and urban densities can be significant on the public health , safety and welfare especially in the Liberty Lake watershed, the potential for landslides and scenic views.

#### **b. Water supply**

Chapter 3.3.1.13.2 uses the term water supply, but does not explain clearly that the demand for water will be for potable water but also for fire flows and possible other uses such as water for recreational facilities and landscape maintenance. The cumulative impacts of these competing demands needs to be identified to be able to address attainable mitigation measures.

### **2. Commercial development**

The impacts associated with commercial development needs to be expanded. The very limited analysis of the impacts of potential commercial development in the DEIS is a real problem. In descriptions of the Alternatives the phrases “current zoning” or “rezoning” occur which means in addition to residential zoning commercial zoning will be allowed, assuming the area is first

annexed to the City of Liberty Lake. Current zones in the City's development code allows mixed use development. "Approximately 20% of the total City acreage is zoned for commercial and industrial development and approximately 14% of the City is zoned for mixed use development. Three existing zoning categories allow a mix of commercial, light industrial uses and residential uses." ( Chapter 3.4 Page 3-36) At the minimum, some type of commercial development is likely along with expanded residential development to complete an urban pattern of development.

### 3. Missing information.

There are gaps in the analysis of impacts.

Examples:

- a. No discussion of the potential impacts of wildland urban interface fire.
- b. No definition of mitigation in Appendix A.

### C. MITIGATION MEASURES

#### 1. Mitigation measure over which the City has no authority

Currently the City of Liberty Lake does not have the authority to provide the full range of urban facilities and services to implement a significant number of the mitigation measures identified in Chapter 2 and 3 of this DEIS. Too much reliance is placed on mitigation measures requiring action by other units of government such as Spokane County, Liberty Lake Water and Sewer District, Spokane County Fire Districts #1 and # 8 and the Central Valley and East School Districts. Implementation of mitigation measures which require unilateral actions by other units of government or joint actions may never occur; thus, the implementation of this type of measure to reduce negative environmental impacts is very speculative.

For example:

- a. "Develop a concurrency management system to assure that adequate fire protection and emergency medical facilities, equipment and personnel are in place at the time that new development is approved or within a reasonable amount of time." Page 3-11
- b. "Require sewer treatment providers to assess the demand for sewage treatment and to treat sewage to meet the need." Page 3-24

- c. "The CVSD future high school could be constructed since the extension of urban services would be available." Page 3-57

## **2. Voluntary mitigation measures**

Citizens and the private sector contribute to the quality of community life in numerous ways, but to accept as a given the private sector will voluntarily implement mitigation measures is not possible. Voluntary measure need to be identified to assure people understand implementation is outside the control of the City.

For example:

- a. "Collaborate with private and public organizations to identify, acquire preserve, operate and maintain open space areas in order to preserve habitat and habitat connectivity." Page 2-39
- a. "Promote low impact development techniques and the reduction of impervious surfaces where possible." Page 2 38
- b. "Utilizing timed interior and exterior lighting for commercial, public and industrial uses." Page 3-66

## **3. Some mitigation measure appear to be goals or objectives**

For example:

- a. "Stormwater management and water quality are important to all surface waters within the planning area to protect all beneficial uses." Page 2-30
- b. "Ensure that adequate transportation facilities are available to serve new development." Page 3-81

## **C. MISCELLANEOUS**

### **1. Public Investments**

Chapter 1 (Page 2-1) states any discussion of financing capital improvements or fiscal impact analysis is not required in the DEIS. Although not required, this omission is unfortunate as so many of the mitigation measures require large investments of public money. In addition, the construction or expansion of regional facilities will require the cost being shared by nonresidents. If there are no revenue sources to accomplish mitigation measures there can be significant negative

environmental impacts, for example, construction of new schools and regional stormwater facilities. A positive contribution to the DEIS would be an addendum providing information giving examples of costs for capital investments and potential revenue sources.

## **2. Distribution list**

A number of agencies and organization that are either mentioned in the description of the environment or are actually included in specific implementation strategies were not listed in the distribution list, Appendix B. If they did not receive the DEIS this is a serious concern. Their comments could provide important information.

### **Natural Environment:**

Washington State Department of Natural Resources

U.S. Fish and Wildlife

### **Built Environment**

East Valley School District

Fire District #8

Spokane County

Emergency Management

Parks and Recreation

Historic Preservation Office

Spokane County Fire District #8

Spokane County Regional Transportation Council

Spokane Transit Authority

Spokane Tribe of Indians

Coeur d' Alene Tribe

**Response to Abby Byrne:**

- 1) Not a comment on the adequacy of the DEIS.
- 2) Add the following to the DEIS page 3-36, section 3.4.1.2.1. after the third sentence in the first paragraph: "A population projection of 15,586 has been adopted for planning purposes. Population forecasts will be updated when the Comprehensive Plan is updated at required intervals."
- 3) Not a comment on the adequacy of the DEIS, but rather an expression of concern for population allocation issues and a preference for a particular planning outcome.
- 4) For the purpose of this document, the terms "population projection" and "population forecast" shall be used interchangeably. The term "expected" is used in this document as "to consider reasonable or due" as defined in Webster's II New College Dictionary, 1995
- 5) The DEIS broadly examines the impacts of a range of strategies for accommodating projected growth. This is a Non-project DEIS, and the concerns of the writer cannot be addressed until and if specific project applications are received. Further environmental review will occur at that time.
- 6) There is an adequate commercial/industrial land supply in the existing city limits.
- 7) For the purpose of this document, the term "mitigation measure" is defined as "an action taken to reduce or eliminate environmental impacts". The definition has been added to the Glossary in Appendix A.
- 8) The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented. Detailed analysis and implementation of mitigation measures will take place upon application of specific projects so appropriate actions can be taken at that time.
- 9) The DEIS prepared by the City of Liberty Lake for the UGA Boundary Alternatives meets all requirements for state law and sufficiently addresses items for this Non-project Action.
- 10) The City of Liberty Lake notified all affected agencies, jurisdictions, and those parties of record who had expressed interest to the best of our knowledge, with the exception of Fire District #8. Fire District #8 was sent notification during the comment period on November 28, 2006.

000020

## Amanda Tainio

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**From:** Amanda Tainio [atainio@libertylakewa.gov]  
**Sent:** Thursday, December 07, 2006 5:06 PM  
**To:** 'Carlson, Sharon'  
**Cc:** Doug Smith (dsmith@libertylakewa.gov)  
**Subject:** RE: Comments regarding DEIS

Thanks for the comments, they will be added to the public record.

Thanks,  
Amanda Tainio  
Associate Planner, City of Liberty Lake  
22710 E. Country Vista Blvd.  
Liberty Lake, WA 99019  
Phone: 509-755-6708, Fax: 509-755-6713  
[atainio@libertylakewa.gov](mailto:atainio@libertylakewa.gov)

-----Original Message-----

**From:** Carlson, Sharon [mailto:Carlson@coffman.com]  
**Sent:** Thursday, December 07, 2006 4:21 PM  
**To:** Doug Smith; Amanda Tainio  
**Cc:** sharoncarlsonpe@msn.com; tcarlsoncpa@msn.com  
**Subject:** Comments regarding DEIS

Doug and Amanda,

Please add my attached letter to the file as written testimony regarding the DEIS. Also, if you could please reply to this message to confirm receipt of my letter, that would be great. Thanks.

Sharon Carlson

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**From:** Doug Smith [mailto:dsmith@libertylakewa.gov]  
**Sent:** Wednesday, December 06, 2006 5:01 PM  
**To:** Carlson, Sharon; Amanda Tainio  
**Subject:** RE: Questions regarding DEIS

Hello Sharon,

Please refer to the DEIS as it provides references to each sections. The individuals responsible for the production of the DEIS were Mary Wren-Wilson, Amanda Tainio, and myself, all employed with the City of Liberty Lake.

Doug Smith

-----Original Message-----

**From:** Carlson, Sharon [mailto:Carlson@coffman.com]  
**Sent:** Wednesday, December 06, 2006 4:46 PM  
**To:** Amanda Tainio  
**Cc:** dsmith@libertylakewa.gov  
**Subject:** FW: Questions regarding DEIS

Amanda,

000021

I have not heard back from Doug. Could you answer the question below for me? Thanks.

Sharon

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**From:** Carlson, Sharon  
**Sent:** Thursday, November 30, 2006 10:28 AM  
**To:** 'dsmith@libertylakewa.gov'; 'Amanda Tainio'  
**Subject:** Questions regarding DEIS

Hi Doug,

I know you have multiple authors of the DEIS. Can you disclose who wrote each section and where their place of employment is? This is more out of curiosity than anything, but may be helpful for me to know and understand as I read through and make comments. Thanks.

**Sharon Carlson, P.E.**

Structural Engineer

Coffman Engineers, Inc.  
10 N. Post St, Suite 500  
Spokane, WA 99201

phone: (509) 328-2994  
fax: (509) 328-2999

[carlson@coffman.com](mailto:carlson@coffman.com)  
[www.coffman.com](http://www.coffman.com)

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000022

December 5, 2006

DEIS Comments  
Planning and Community Development Department  
22710 E. Country Vista Drive  
Liberty Lake, WA 99019

Subject: Written Testimony regarding the City of Liberty Lake UGA Boundary Extension  
Draft Environmental Impact Statement (DEIS)

To Whom It May Concern:

What an ambitious project this is to undertake in such a short amount of time. One would think, and all who live in the Liberty Lake vicinity would hope, that you would be incredibly thorough in your future planning of this community. But it does not seem to be so as indicated by the aggressive schedule that has been followed in putting this document together. }

My comments that pertain directly toward the written DEIS are as follows:

1. Section 1.3.1. The Washington State Growth Management Act (GMA) states that one of its goals is to, "Protect critical areas and the environment." Any land that is designated as RCV or Rural Conservation is a critical area and should be protected under the GMA. As currently designated, this will allow for one dwelling unit per 20 acres in the area on the map shown as RCV. This is the maximum density this area should have developed on it.

Section 2.1.2. Earth – Impacts states, "the Spokane County Board of Commissioners recently passed a resolution regarding adoption of screening and evaluation criteria for the Spokane County Comprehensive Plan Update which states that land currently zoned Rural Conservation should be excluded from inclusion in the UGA." Approximately 1/4 of the area that is proposed to be included in the new UGA encompasses land designated as RCV (rural conservation). This land was designated as such for reasons by previous planners. No matter what type of mitigation measures are used to lessen the impacts to this land, it will still be greatly impacted. This land should not even be under consideration to be converted and developed for urban land use. It should remain a critical area for wildlife and habitats. }

2. Section 1.3.1. The Washington State Growth Management Act (GMA) states, "provide adequate public facilities and services to serve new growth." Many of the current public facilities and services (schools, transportation corridors, sewer and water resources, police, fire and emergency) are to capacity today. We have not yet exhausted the density build-out within the current UGA lines. It does not make sense, that as a community, we would want to place more pressure on our current service providers with an increased amount of developments. Our services should be able to support growth on a concurrent level. Right now it is a struggle to keep up, and in some cases we have surpassed the service capacities. Our community should have control of development; development should not control us. }

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It is unfortunate for our community and for the children in the CVSD attendance area that "schools are an indirect concurrency requirement; meaning overcrowded schools can not be a factor used for controlling growth." Our city planners, commissioners and mayor can choose to be who they want to support, how our community is shaped, and what our community will look like. Without using this as one of the tools for planning would be very incredulous.

The City of Liberty Lake is not alone in planning for our regional area and should not react like it. Spokane County, City of Spokane, City of Spokane Valley and City of Liberty Lake have comprehensive plans that include planned developments within their respective areas. It is imperative that each jurisdiction work together so that efforts to support increasing population, water demands, transportation needs, public education, sewer service, police and fire protection, air quality are not overlooked when decisions like this are being made.

3. Section 2.4.1. Watersheds and Drainage states, "The planning area wholly or partially overlies 2 watersheds and critical to moderate susceptibility aquifer recharge areas." Susceptibility: to easily affect. Approved development in the proposed areas will certainly affect our aquifer and watershed. The only mitigation measure you could take here would be to take the first alternative. Leave the developments in areas already designated for urban growth instead of expanding them into critical areas. Changing the UGA will add huge negative impacts to our delicate aquifer. All alternatives suggested except for alternative 1 "would be expected to have significant and widespread impacts to surface water, groundwater, and wetlands." As stated on page 2-28. How will you mitigate this?
4. Section 3.3.1.13.1. Water Supply – Existing Conditions states, "Current capacity and facility information is not available through either water purveyor as each are in the process of updating their water system plans which include inventories and anticipated capital projects." It would seem that this is a very important issue that we would not want to rush into without knowing what our water supply is for the existing community. Your answer to a question raised by the general public specifically states, "Studies are currently underway to determine the capacity of the aquifer; right now the limiting factor is water rights." A wise decision to increase the demand on our water supply by expanding the UGA should be based on all known facts. Giving our water suppliers time to present a complete and updated plan seems like a logical reason for waiting to make a well educated vote such as this.
5. Section 3.4.2. Population Growth and Land Supply Mitigating Measures states, "Within the existing City limits, the City of Liberty Lake can also do the following:
  - Ensure that assigned zoning densities fully utilize the infrastructure potential.
  - Increase minimum densities to ensure full build out of available land.
  - Require mixed housing types within the mixed-use zones.

- Increase existing impact fees or create new impact fees to require new development to pay a larger share of the full cost of the services and capital projects necessitated by new development.
- Consider enacting impact fees for parks and fire and emergency services facilities."

The concern here is that why hasn't the City already implemented these mitigating measures for our community? By acting on any or all of the above items, the City should be able to accommodate the expected growth within current boundary lines and would have collected fees to help pay for the badly needed infrastructure to keep up with the rapid growth we have been experiencing. The time to enact on these measures is now before any more development is approved, not after.

6. Section 3.8.1. Transportation and Circulation – Existing Conditions states, "Providing transportation infrastructure at the same time as, or in advance of, development can be much more cost-effective than retrofitting inadequate road infrastructure after development has occurred." Traffic congestion must be resolved not only by the City of Liberty Lake but also Spokane County, City of Spokane Valley and WSDOT. All jurisdictions involved are affected by what the City of Liberty Lake does. Much more money will be spent on "fixing" our problems after we have created them rather than being proactive now and addressing current issues before making larger ones.

Many of our roads, arterials and intersections might be operating in Levels of Service (LOS) conditions of D or better, but what about the two lane bridge to access I-90 and the interchange itself? What about driving in our city at peak travel times? We account for travel by residents and employees of businesses in Liberty Lake (who are not residents of Liberty Lake) by compiling traffic studies and analysis. What do these findings say? From sources at Spokane County, City of Spokane Valley and WSDOT, it has been said that City of Liberty Lake has not provided them with the facts, findings, studies and analysis for traffic so they can accommodate their growth along with ours. Nor has the City of Liberty Lake taken the other jurisdictions studies into consideration for this DEIS.

7. Section 3.8.3. Transportation and Circulation – Mitigating Measures has six pages of options the city can implement "as warranted and approved." How will these items be paid for? WSDOT has said there is no federal funding for projects like these, but the City Council can vote for and impose a tax to fund them. This is a concern considering our community did not vote for our school bonds because they did not want to increase their taxes any more. Your idea of building more units to spread out the tax base for projects such as this is very skewed. Your plan is for 1600+/- additional new homes (in this one development), which will not be completely built-out for say 10 years or more. Our transportation infrastructures are going to need attention way before this happens and we will not have this "full" tax base to pull from. It sounds good in theory, but reality is a different story.

In summary, I oppose any proposal to extend the current UGA lines that will eliminate the wildlife corridors, habitats and open spaces. In my opinion, no further developments shall be approved until the school district (and other services) can adequately house the students that

currently reside in our community and provide for future growth as projected. An extension of the UGA that will encompass critical wetlands, aquifer recharge areas, the Liberty Lake watershed, and the Spokane River would not be a sound decision based on the negative impacts this will create to our environment. Many are of the impression that our water supply is endless. In fact, we just happen to be lucky enough to enjoy excellent water quality, but it is not free or endless. We need to protect, at all costs, this fragile part of our ecosystem. Developers should be required to pay adequate fees to not only provide roads, parks and green spaces within their project areas, but also required to pay for and provide upgrades and/or redesigned intersections to our existing roads, police, fire and emergency services and other capital projects within our City that will be affected and/or needed by their developments.

Respectfully Submitted,



Sharon E. Carlson, P.E.  
1022 S. Liberty Drive  
Liberty Lake, WA 99019  
(509) 255-5156

**Response to Sharon Carlson:**

- 1) The City of Liberty Lake has met all SEPA notice and commenting periods required by state law as adopted in the City of Liberty Lake Development Code, Chapter 6 Environment, section 6A-11, pages 6-21 through 6-22.**
- 2) Not a comment on the adequacy of the DEIS, but rather an expression of concern for various issues and a preference for a particular planning outcome.**
- 3) The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented. Detailed analysis of impacts and implementation of mitigation measures will take place upon application of specific projects so appropriate actions can be taken at that time.**
- 4) The DEIS does not attempt an environmental review of all transportation alternatives and mitigating measures. Such detailed analysis may be considered as part of the annual updates of the City and County 6-Year Transportation Improvement Plans and as individual improvement projects are undertaken.**

Heather Chalich  
23305 E. Maxwell Avenue  
City of Liberty Lake

November 27, 2006

To all members of the Planning Commission,

My husband and I have both lived in Liberty Lake for over 30 years and would like state for the record we are adamantly opposed to expanding the current UGA boundaries in both the NW and SW areas. Following are the reasons why. Please take these into consideration when giving a recommendation to the City Council.

Natural environment has been dramatically altered and must be protected. The very reason people chose to live here is being destroyed.

The Spokane River and Liberty Lake area very sensitive systems and the health of these systems must be put before development demands by the city. Not all areas are privileged to have such beautiful water systems so close and it is our responsibility to take care of them.

Wildlife and vegetation in the area must be preserved for the health of the entire watershed

Road system needs to be addressed. Roads are already becoming congested at certain hours of the day. There is only one lane of traffic allowed out of this city onto I-90. We must have a better road system in place for the safety of all living in the area.

School system is overcrowded and is going to get worse with the failing of the school bond. My daughter will be bused to kindergarten next year when we live less than a mile from the elementary school. I wonder where my 2 1/2 year old son will end up. We are playing catch up with our school system and that is detrimental to our kids. We need to allow our school system to catch up with our growth.

I care deeply about what happens to this area because it's where I grew up and where I would like to raise my children. I believe it is our duty to protect the values this community has been built on and that means saying "slow down" or "no" to irresponsible growth.

Thank you for your time,



Heather Chalich

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**Response to Heather Chalich:**

**Not a comment on the adequacy of the DEIS, but rather an expression of concern for various issues and a preference for a particular planning outcome.**

000029

## Amanda Tainio

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**From:** Doug Smith [dsmith@libertylakewa.gov]  
**Sent:** Friday, December 08, 2006 4:34 PM  
**To:** Mary Wren  
**Cc:** Amanda Tainio  
**Subject:** FW: DEIS Comments

-----Original Message-----

**From:** Heather Chalich [mailto:chalharp@msn.com]  
**Sent:** Friday, December 08, 2006 1:02 PM  
**To:** dsmith@libertylakewa.gov  
**Subject:** DEIS Comments

Attached are my comments for the DEIS on UGA Boundaries.  
If you have any questions, you can contact me at the number below.  
Thank you.

Heather Chalich  
(509) 892-1133

000030

To: SEPA Lead Agency, City of Liberty Lake  
Planning and Community Development Department  
Doug Smith, Director  
22710 E. Country Vista Dr.  
Liberty Lake, WA 99019

From: Heather Chalich, City of Liberty Lake Resident  
23305 E. Maxwell Avenue  
Liberty Lake, WA 99019

RE: Comments on Draft Environmental Impact Statement for Urban Growth  
Boundary Alternatives

Please enter into the record the following written testimony on the Draft EIS for UGA  
Expansion Alternatives. I am in support of Alternative #1.

Boundary lines in conflict with Spokane Board of Commissioners' resolution.

Boundary lines for all alternatives, except #1 and #3, are in conflict with the  
Spokane County Board of Commissioners' resolution regarding adoption of screening  
and evaluation criteria for Spokane County Comprehensive Plan Updates, which  
states, that land currently zoned Rural Conservation should be excluded from  
inclusion in the UGA. All boundary lines drawn for the SW UGA include currently  
zoned Rural Conservation lands.

Inadequate Distribution List - Appendix B

As stated in the document itself, public involvement is a very important part  
of the planning process. Numerous agencies and organizations were completely left  
out of the input process. Following are two examples of agencies not included in the  
document's distribution that should have been.

1.) *Spokane County Fire District #8.* The southern half of the proposed SW  
expansion area is covered by Fire District #8. In Appendix B: Distribution List, Fire  
District #8 is not listed. I asked Doug Smith at the November 27<sup>th</sup>, 2006 Planning  
Commission meeting if District #8 had been included in the distribution and he said  
he thought so. I contacted Fire District #8 on November 29<sup>th</sup>, 2006 to find out if  
they had received the DEIS and spoke with Cheryl Sparks at reception. She told me  
they had just received an envelope that day from the City of Liberty Lake. That left  
less than 6 working days to read and comment on the document. It also means they  
were not involved in the initial scoping process for the document. Fire, police, and  
water supply are main infrastructure that must be adequate for an area to be moved  
into a UGA. All fire districts should have been at the top of the list for involvement  
and input on the proposal.

2.) *Spokane County Conservation District (SCCD).* The NW UGA's entire  
southern border is the Spokane River which the SCCD just did a Proper Function  
Condition and Stream Inventory Assessment in 2005 rating that reach of river as  
having "high" developmental risk potential. The SCCD also found the reach to be a  
"High Quality Area", which is defined as area that include terrestrial and aquatic  
areas that are important to local wildlife and fisheries, support human enjoyment of  
views, or provide important or unique recreational opportunities. The SCCD's report  
can be found at [www.sccd.org/water/shoreline/PFCRport.shtml](http://www.sccd.org/water/shoreline/PFCRport.shtml). This agency should  
have been notified and involved in the input process.



## 2.4 Water Resources

All through the 2.4 Water Resources section the following statement was used under Land Use,

"The NW portion of the planning area is used for agriculture with associated residential uses and single family residential. This area also provides wildlife habitat, recreation, and fishing. There are no priority habitats or species in this planning area (see Map 2.9)."

The statement, "there are no priority habitats or species in this planning area" is incorrect. When looking at the map provided in the document titled "UGA Boundaries Study Priority Habitats" it actually shows the entire Spokane River designated as Urban Natural Open Space. This designation is considered a Priority Habitat by the WA Department of Fish & Wildlife (WDFW). The WDFW's website, (<http://wdfw.wa.gov/hab/phshabs.htm>), defines Urban Natural Open Space as follows:

A priority species resides within or is adjacent to the open space and uses it for breeding and/or regular feeding; and/or the open space functions as a corridor connecting other *priority habitats*, especially those that would otherwise be isolated; and/or the open space is an isolated remnant of natural habitat larger than 4 ha (10 acres) and is surrounded by urban development. Local considerations may be given to open space areas smaller than 4 ha (10 acres). **Criteria:** Comparatively high fish and wildlife density, high fish and wildlife species diversity, important fish and wildlife breeding habitat, important fish and wildlife movement corridors, limited availability, high vulnerability to habitat alteration.

### 3.3.1.13.1 Water Supply - Existing Conditions

The following statement was made in 3.3.1.13.1 Water Supply - Existing Conditions section, "Current capacity and facility information is not available through either water purveyor as each are in the process of updating their water system plans which include inventories and anticipated capital projects." If capacity numbers and facility information are not available for existing conditions then it's not possible to predict impacts and provide mitigating measures for proposed UGA expansions. This document is required to do just that. Water supply is a major infrastructure piece that must be proven to exist before moving land into a UGA. Without this information it is unknown if water will even be available.

## Appendix C: References

### GIS Map Sources:

There is a map titled "UGA Boundaries Study, Natural Resource Lands & Historic Sites". I can only find reference material for Natural Resource Lands, which doesn't describe the information the data represents, and no reference material for the Historic Sites. Historic Sites are sensitive information and exact locations should not be published for the public as was done in the document with Map 2.10.

Thank you for the opportunity to comment,

Heather Chalich  
City of Liberty Lake Resident

000332

Response to Heather Chalich:

- 1) Not a comment on the adequacy of the DEIS, but rather an expression of a preference for a particular planning outcome.
- 2) The County's policy on consideration of Rural Conservation Zone inclusion in a UGA is also covered on pages 2-5 and 2-7: "The Spokane County Board of Commissioners recently passed a resolution regarding adoption of screening and evaluation criteria for the Spokane County Comprehensive Plan Update which states that land currently zoned Rural Conservation should be excluded from inclusion in the UGA."

The DEIS does not advocate for any alternative or combination of alternatives examined.

- 3) The City of Liberty Lake notified all affected agencies, jurisdictions, and those parties of record who had expressed interest to the best of our knowledge, with the exception of Fire District #8. Fire District #8 was sent notification during the comment period on November 28, 2006.
- 4) Section 2.4 Water Resources. Make the following correction on page 2-24 of the DEIS, Land Use: Replace "There are no priority habitats or species in the planning area" with "The stretch of the Spokane River in the NW planning area has been designated Urban Natural Open Space. Urban Natural Open Space is defined as "A priority species resides within or is adjacent to the open space and uses it for breeding and/or regular feeding; and/or the open space functions as a corridor connecting other *priority habitats*, especially those that would otherwise be isolated; and/or the open space is an isolated remnant of natural habitat larger than 4 ha (10 acres) and is surrounded by urban development. Local considerations may be given to open space areas smaller than 4 ha (10 acres)." (Definition provided on <http://wdfw.wa.gov/hab/phshabs.htm> )".

Section 2.5.1.1.6. Riparian Areas. Add to text: "The stretch of the Spokane River in the NW planning area has been designated Urban Natural Open Space. Urban Natural Open Space is defined as "A priority species resides within or is adjacent to the open space and uses it for breeding and/or regular feeding; and/or the open space functions as a corridor connecting other *priority habitats*, especially those that would otherwise be isolated; and/or the open space is an isolated remnant of natural habitat larger than 4 ha (10 acres) and is surrounded by urban development. Local considerations may be given to open space areas smaller than 4 ha (10 acres)." (Definition provided on <http://wdfw.wa.gov/hab/phshabs.htm> )".

Section 2.5.1.3.1. Priority Habitats. Make the following correction on page 2-36 of the DEIS: Replace "There are no priority habitats or species in the NW planning area" with "The stretch of the Spokane River in the NW planning area has been designated Urban Natural Open Space. Urban Natural Open Space is defined as "A priority species resides within or is adjacent to the open space and uses it for breeding and/or regular feeding; and/or the open space functions as a corridor connecting other *priority habitats*, especially those that would otherwise be isolated; and/or the open space is an isolated remnant of natural habitat larger than 4 ha (10 acres) and is surrounded by urban development. Local considerations may be given to open space areas smaller than 4 ha (10 acres)." (Definition provided on <http://wdfw.wa.gov/hab/phshabs.htm> )".

- 5) The DEIS broadly examines the impacts of a range of strategies for accommodating projected growth. This is a Non-project DEIS, and the concerns of the writer cannot be addressed until and if specific project applications are received. Further environmental review will occur at that time. The information for Historic Sites was compiled from information provided by Spokane County.

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- 6) The information used for identifying historic sites was compiled with information supplied by Spokane County.

**Amanda Tainio**

**From:** Doug Smith [dsmith@libertylakewa.gov]  
**Sent:** Friday, December 08, 2006 7:51 AM  
**To:** Mary Wren  
**Cc:** Amanda Tainio  
**Subject:** FW: DEIS alternative choice for UGA expansion

-----Original Message-----

**From:** beth [mailto:rbcocchiarella@msn.com]  
**Sent:** Thursday, December 07, 2006 9:16 PM  
**To:** dsmith@libertylakewa.gov  
**Subject:** DEIS alternative choice for UGA expansion

To; Doug Smith City of Liberty Lake  
27710 E Country Vista Drive  
Liberty Lake, WA 99019

From; Beth Cocchiarella  
715 S Liberty Drive  
Liberty Lake, WA 99019

December 7, 2006

Written testimony- regarding two issues and the information is unclear about how to respond correctly- I have comments on the DEIS and a request for the Alternative choice for UGA – it is my intent to comment on both of these issues; }

UGA Timeline and steps in the EIS process;

The document states that the UGA study boundary was introduced at the 4PM Planning Commission Meeting 8/30/06- I was approached on 8/31/06 by an adjunct member of the Planning Commission who stated that there was no discussion, after the representative of the press had left the room, a map was handed out of one study area. I chair the Liberty Lake Green Space Committee and our regularly scheduled meeting was September 7- due to the enormous impact on the green space in the community and the nearness of our meeting I invited Doug Smith and Steve Davenport from Spokane Planning to educate the community on the steps involved in the UGA expansion process- Mr. Smith agreed to attend then had a conflict, so Mr. Davenport presented the process and answered questions. Only one map alternative was available at this time. Why was it the responsibility of the community to seek out information on the process? }

I am a member of the Washington Citizens Advisory Committee for the Spokane River Basin Clean-Up and I requested in my SCOPING comment that Zach Hedgpeth Dept of Ecology be contacted- I do not see a response from him. The clean-up of the portion of the Spokane River at Harvard Road is scheduled for fall, 2007. The ongoing environmental concerns regarding the river and the continuing Bunker Hill mining waste must be monitored by anyone utilizing the Spokane River, and surely any development on the river side must be involved in this process. }

As a tax payer responsible for roads, schools, fire and police protection in the county, I am most

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12/8/2006

dismayed that a Capital Facilities Plan is not available. How much is this UGA expansion going to cost me? I read about a new police station, section 3-11; 22 policemen- at one per 1,000 population 3-12, a new fire station, numerous roads- and the staff to accommodate these facilities- what is my portion to pay? } 4

Page 3 also 2-42 preserve properties of high scenic value- the city considered but declined to pass an ordinance protecting view corridors- alternative 1 is best } 5

Page 4 planned for open space- Hearing Examiner decision on the Rudeen/Main property states that the city has not defined the extent of the natural open space corridor along Liberty Lake Road- what does the city mean by an open space zone in a natural area? } 6

Page 1-11 provide certainty to residents, property owners developers and the community regarding the nature and extent to future development. I attended numerous meeting in 2002 to set the growth in the area for the next 20 years- this current UGA change proposal undermines that extensive process. What happened to certainty? } 7

Page 1-8 Goal #1 of the GMA; development in urban areas where public services can be effectively provided Alternative 1 is best

Page 1-9 discourage sprawling development, protect critical areas and open spaces- alternative 1 is best

Page 2-10 Brenda Sims, stormwater utilities manager;" infrastructure suitable for serving urban densities will not be possible until funding for basin planning and stormwater facility construction are available." June 30, 2006 comments on UGA boundary alternative 1 is best } 5

Page 2-29 why place the Spokane River and Liberty Lake watershed at risk? Alternative 1 is best

Also 3-31 stormwater comments do not reflect reaction to Brenda Sims report — 8

2-24 NW area designation rural conservancy with 3 identified reaches of High Quality Areas where development must not take place- Alternative 1 is best — 5

2-26 250' buffer from development contrast with 3-7 50 feet back from high water mark- quite a difference- what is the regulation? — 9

3-7 Golf courses use pesticides and herbicides. How can the wetlands be protected? Alternative 1 is best — 5

3-25 in general solid waste, recycling, yard waste pick up can be done more economically under alternatives that limit the geographic area- alternative 1 is best. — 5

**ALTERNATIVE 1 IS BEST.** — 5

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No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.432 / Virus Database: 268.15.14/578 - Release Date: 12/07/2006 1:27 AM

000030

Response to Beth Cochiarella:

- 1) The City included two pages of instruction on how to comment on the DEIS and the alternatives in the opening pages of the DEIS.
- 2) The 8/30/06 meeting was not scheduled as a discussion; it was an introduction only of the UGA boundary process. A map of the entire study area was given out for informational purposes, and was not intentionally withheld from any member of the press. The choice of the member of the press to leave the room is not under the control of the City.

The City of Liberty Lake has met all SEPA notice and commenting periods required by state law as adopted in the City of Liberty Lake Development Code, Chapter 6 Environment, section 6A-11, pages 6-21 through 6-22.

- 3) The City notified the WA Department of Ecology through the proper channels and received comment from the Eastern Region SEPA Coordinator and communicated with the SEPA/ORA Manager for the WA DOE in Olympia.
- 4) WAC 197-11-450 states that "A cost-benefit analysis (WAC 197-11-726) is not required by SEPA. If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered by an agency for the proposal, it may be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences. For purposes of complying with SEPA, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations."
- 5) Not a comment on the adequacy of the DEIS, but rather an expression of a preference for a particular planning outcome.
- 6) Open Space is addressed in the City Development Code in Article 10-2L O(Open Space/ Recreation) District and is defined as follows: "10-2L-1 Purpose – The O (Open Space / Recreation) District provides for a range of open area spaces and recreational uses such as public/ private parks, campgrounds, public and privately owned facilities such as golf courses and their associated uses, and similar uses which retain open space. The district's standards are based on the following principles:
  - A. Ensure efficient use of land and urban services.
  - B. Provide areas for parks, recreational, and associated uses.
  - C. Compatibility between open space and recreation uses and nearby residential areas.
  - D. Protect natural and open space areas to preserve the aesthetics of the City.
- 7) Not a comment on the adequacy of the DEIS, but rather an expression of concern for various issues.
- 8) The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented. Detailed analysis of impacts and implementation of mitigation measures will take place upon application of specific projects so appropriate actions can be taken at that time.
- 9) Type 1 DNR streams require a 250' buffer; Spokane County Shorelines Program requires that residential development must be set back no less than 50 feet back from the ordinary high water mark. Because the Spokane River is considered a Type 1 DNR stream in the planning area, the 250' buffer would apply as it is the more restrictive of the two.

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